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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 JOHN MORALES,

12 Plaintiff,

13 vs.

14 STEPHEN INVESTMENTS, INC., et al.,

15 Defendants.
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) No: 1:11-CV-00484-AWI-SMS
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**STIPULATION FOR DISMISSAL OF
ACTION; [PROPOSED] ORDER**

18 IT IS HEREBY STIPULATED by and between Plaintiff John Morales (“Plaintiff”) and
19 Defendants Stephen Investments, Inc. and Vilavan Sayaseng dba Dari Delite (“Defendants”),
20 by and through their respective counsel, that pursuant to Federal Rule of Civil Procedure
21 41(a)(2), this action be dismissed with prejudice.

22 IT IS FURTHER STIPULATED between Plaintiff and Defendants that this case has
23 been settled as between them and all issues and controversies have been resolved to their
24 mutual satisfaction. Plaintiff and Defendant request the Court to retain jurisdiction to enforce

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1 the terms of their settlement agreement under the authority of *Kokkonen v. Guardian Life Ins.*
2 *Co. of America*, 511 U.S. 375, 381-82 (1994).

3 Date: July 12, 2011

MOORE LAW FIRM, P.C.

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5 /s/ Tanya E. Moore
6 Tanya E. Moore
7 Attorney for Plaintiff John Morales
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9 Date: July 12, 2011

WILD, CARTER & TIPTON

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11 /s/ Wesley J. Hammond
12 Wesley J. Hammond, Attorneys for
13 Defendants Stephen Investments, Inc.
14 and Vilavan Sayaseng dba Dari Delite

14 **ORDER**

15 The parties having so stipulated,

16 **IT IS HEREBY ORDERED** as follows:

17 1. Plaintiff John Morales and Defendants Stephen Investments, Inc. and Vilavan
18 Sayaseng dba Dari Delite shall comply with the terms of the confidential Settlement Agreement
19 and Release in Full, the terms of which are incorporated herein by reference.

20 2. By consent of Plaintiff John Morales and Defendants Stephen Investments, Inc.
21 and Vilavan Sayaseng dba Dari Delite, the Court shall retain jurisdiction in this matter for the
22 purpose of enforcing the terms of the settlement agreement.

23 3. Except as provided for in paragraphs 1 and 2 above, Stephen Investments, Inc.
24 and Vilavan Sayaseng dba Dari Delite are dismissed with prejudice and this action is therefore
25 dismissed in its entirety.

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1 IT IS SO ORDERED.

2 Dated: July 12, 2011



CHIEF UNITED STATES DISTRICT JUDGE

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